

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
MIDDLE DIVISION

Romania Ann Gadson, )  
\_\_\_\_\_, )  
\_\_\_\_\_, )  
PLAINTIFF, )  
\_\_\_\_\_, )  
\_\_\_\_\_, )  
VS. ) CIVIL ACTION NO. \_\_\_\_\_  
\_\_\_\_\_, )  
Sheriff John Fusion, )  
Officer Wright, )  
Cpl. Joseph Welch, )  
DEFENDANT (S) )

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER  
42 U.S.C. § 1983

I. Previous Lawsuits :

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States district Court for the Middle District of Tennessee, or in any other federal or state court?

Yes       No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to this previous lawsuit:

Plaintiffs: N/A

Defendants: N/A

2. In what court did you file the previous lawsuit?

N/A  
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? N/A

4. What was the Judge's name to whom the case was assigned? N/A

5. When did you file the previous lawsuit? N/A (Provide the year, if you do not know the exact date.)

6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending?

N/A

7. When was the previous lawsuit decided by the court? N/A (Provide the year, if you do not know the exact date.)

8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.

Yes       No

(If you have filed more than prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

**II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)**

A. What is the name and address of the prison or jail in which you are currently incarcerated?: Montgomery County Jail

Clarksville, Tennessee 37040

B. Are the facts of your lawsuit related to your present confinement?

Yes       No

C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. N/A

D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?

Yes       No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D. above, have you presented these facts to the prison authorities through the state grievance procedure?

Yes

No

F. If you checked the box marked "Yes" in question II.E. above:

1. What steps did you take?

N/A

2. What was the response of prison authorities? N/A

G. If you checked the box marked "No" in question II.E. above, explain why not.

N/A

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

Yes

No

I. If you checked the box marked "Yes" in question II.H. above, have you presented these facts to the authorities who operate the detention facility?

Yes

No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? I Wrote Several Grievance's

2. What was the response of the authorities who run the detention facility?

That I'll Be Moved At A Later Date, My Treatment Is Fair.

L. If you checked the box marked "No" in question II.I above, explain why not.

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

### III. PARTIES TO THIS LAWSUIT

#### A. Plaintiff(s) bringing this lawsuit:

Name of the first plaintiff:

Romania ANN Gadson

#6

Prison Id. No. of the first plaintiff:

Montgomery County Jail

Address of the first plaintiff:

116 Commerce Street

Clarksville, Tennessee

37040

(Include the name of the institution and mailing address, including the zip code. If you change your address you must notify the Court immediately.)

2. Name of the second plaintiff: N/A

Prison Id. No. of the second plaintiff: N/A

Address of the second plaintiff: N/A

(Include the name of the institution and mailing address, including the zip code. If you change your address you must notify the Court immediately.)

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Sheriff John Fusion

Place of employment of the first defendant: Montgomery County Jail

The first defendant's address: 116 Commerce Street

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

2. Name of the second defendant: Officer Wright

Place of employment of the second defendant: Montgomery County Jail

The second defendant's address: 116 Commerce Street

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

3. Name Of The Third Defendant: Cpl. Joseph Welch  
Place Of Employment Of The Third Defendant: Montgomery County Jail  
The Third Defendant's Address: 114 Commerce Street  
Named In Official Capacity? Yes  
Named In Individual Capacity? Yes

\* Romania Gadson  
114 Commerce Street  
Clarksville, Tenn 37040

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing hem. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

#### IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where there they occurred, and how each defendant was involved. Be sure to include the names of other personas involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8-½ in. x 11-in. paper. Write on one side only, and leave a 1-in. margin on all four (4) sides.

1st Claim - (Discrimination)

On August 25, 2013 At 9:25 p.m. Inmate Taylor Underwood Was Dressed In The Shower And Several Of Us Wanted To View A Tattoo On Ms. Underwood's Side. She Showed Myself, Jaryena Griffin, Johnetta Hill, Genera Wynn And Marquisha Robertson The Tattoo. Officer Wright Had Officer James To Place All 6 Of Us In Our Cell At 10:45 Officer Wright And Col. Talley Came To Address Our Write-Ups To Each Of Us. Out Of The 5 Inmate's Who Looked In The Shower I Was The Only Person Locked Down For 120 Hours Due To The Fact That I'm Gay. The Other 4 Female's Got 72 Hour Lockdown. I Was Also Placed On A Lockdown Pod That Only Come's Out (2) Hours A Day. This Is Mental Torture. While On The Other Pod I Was A Pod Worker Getting 2 For 1 On A 11/29 Sentence. I Was Also Getting 68 Days A Month Towards My 4 Year's At 30%. Now That I've Been Placed On A Lockdown Pod (L-Pod) I'm Unable To Work. This Is Making My Stay Here Longer. Col. Welch Is The One Who Had Me Moved. I'm Filing This Civil Suit Due To Me Being Discriminated Against.

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant:

## 2nd Claim-(Unfair And Impartial Treatment)

On September 15, 2013 At 8:45 p.m. Inmate Tiffany Hampton Who Lives On M-Pod Cell #4 Was Caught Inside Another Female's Cell M-Pod Cell #1 With The Door Shut - Only Her And Leslie Rye Was Inside, The Only Punishment Tiffany Hamilton Received Was A 48 Hour Lockdown (Leslie Rye Receive No Punishment). This Is Unfair And Impartial Treatment Because This Incident Was Far Worse Then Mine, Per Policy "Inmate's Are Not To Enter Another Inmate's Cell." All Inmate's Are Suppose To Be Treated The Same, No Favoritism.

X Romania Gadson  
114 Commerce Street  
Clarksville, Tenn 37040

- A. Sheriff John Fusion - I'm Seeking The Relief That Mr Fusion Improve's The Staff And Explain To Each One That All Inmate's Should Be Treated The Same No Matter Color Or Sexually, I Also Seek That He Answers His Own Grievence's No one Else.
- B. Officer Wright - I'm Seeking The Relief That Off. Wright Have To Take A Class About Discrimination And \$1,800 Dollar's Due To Pain, Suffering And Stress.
- C. Cpl. Joseph Welch - I'm Seeking The Relief That Cpl. Welch Move Me Back To M-Pod, Giving My Job Back And \$1,000 Dollars Due To Pain, Suffering And Stress.

D. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

F. I request a jury trial.  Yes  No

#### VI. CERTIFICATION

I (We) hereby certify under penalty of perjury that the above petition is true to the best of my (our) information, knowledge and belief.

Signed this 17 day of September, 2013.

*Romania Gadson*  
116 Commerce Street  
Clarksville, Tenn  
37040  
(Signature and address of Plaintiff(s))

STATE OF TENNESSEE

*MONTGOMERY*  
COUNTY OF DICKSON *(initials)*

Sworn to and before me this 17 day of SEPTEMBER, in the year of 2013.

Harold E. Stilts  
Notary Public

My commission expires: 01-13-15

